

William C. Bond

Pro Se Litigation

500 W. University Parkway, # 4 L

Baltimore, Maryland 21210

443.970.2887

proselitigator@aol.com

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The Hon. Richard D. Bennett *via: Email*

U.S. District Judge

United States District Court for the District of Maryland

Baltimore Division

101 West Lombard Street

Baltimore, Maryland 21201

RE: Criminal Action No.: 14-00186-RDB-1

Dear Judge Bennett:

I write to ask that you reconsider your orders denying the unsealing of the attorney disqualification documents because of new facts. While persistent, I continue in good faith and understand my standing is only as a member of the public seeking to vindicate certain rights under the First Amendment and the common law.

On Wednesday, the government filed a superseding indictment in the *Ravenell* prosecution adding attorney Joshua Treem and a private investigator as defendants. *See* 19-cr-00449-LO (D. Md.).¹ The next day, *The Baltimore Sun* wrote an extensive story about the filing. *See* <https://www.baltimoresun.com/news/crime/bs-md-ci-cr-ravenell-more-charges-20201218-x2bpanbdevedjo3mn2yo4niive-story.html>.

This 50-page-long *Treem* “talking” indictment had a lot to say. The government appears to have negated any continued reason to keep the subject disqualification papers here still sealed by making public the allegations and transcripts within the new indictment. In the alternative, outside the identities of “Lawyers 1 & 2” and any specific information strictly limited to grand jury confidentiality or rules, redactions rather than complete sealing would appear to more closely satisfy the public’s rights.

There also is the new-discovered matter of a letter Treem wrote this Court. The indictment goes at length into the contents of this letter and quotes parts of it. While there is no telling whether this letter was put onto the docket under seal, if it was, it would also appear to qualify for unsealing.

¹ Please see: Exhibit no. 1.

I ask for the Court to treat this letter as a motion to reconsider its orders denying the unsealing of the attorney disqualification documents and order unsealed or in redacted form the subject records.

Thank you very much for your consideration.

I hope this letter finds you well.

Very truly & respectfully yours,



William C. Bond

cc: Leo Joseph Wise, AUSA USAO MD *via: Email*
Matthew James Maddox, AUSA USAO MD *via: Email*
Kenneth Sutherland Clark, AUSA USAO MD *via: Email*